

Bonnie MacNaughton (Bar No. 107402)  
 Emily Goodell (admitted *pro hac vice*)  
 DAVIS WRIGHT TREMAINE LLP  
 920 Fifth Avenue, Suite 3300  
 Seattle, WA 98104  
 Telephone: (206) 622-3150  
 Facsimile: (206) 757-7700  
 Email: bonniemacnaughton@dwt.com  
 emilygoodell@dwt.com

John D. Freed (Bar No. 261518)  
 Jean M. Fundakowski (Bar No. 328796)  
 DAVIS WRIGHT TREMAINE LLP  
 50 California Street, Floor 23  
 San Francisco, CA 94111  
 Telephone: (415) 276-6500  
 Facsimile: (415) 276-6599  
 Email: jakefreed@dwt.com  
 jeanfundakowski@dwt.com

Attorneys for Plaintiffs  
 AMAZON.COM, INC. and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

AMAZON.COM, INC., a Delaware  
 corporation, and AMAZON TECHNOLOGIES,  
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF EMILY GOODELL  
 IN SUPPORT OF PLAINTIFFS  
 AMAZON.COM, INC. & AMAZON  
 TECHNOLOGIES, INC.'S REQUEST  
 FOR ENTRY OF DEFAULT BY CLERK  
 PURSUANT TO FED. R. CIV. P. 55(A) AS  
 TO DEFENDANTS:**

- (1) VTLOGODESIGN, INC.;
- (2) MK AFFILIATES, INC.;
- (3) ALI ALAM;
- (4) DYNAMIC DIGITAL SOLUTIONS  
LLC;
- (5) MEHWASH MUNIR;
- (6) ONE STOP COMPUTER SERVICES  
LLC;
- (7) MUHAMMAD ZUBAIR KHAN;
- (8) TECHTURE INC.;
- (9) MUHAMMAD MUDASSAR  
ANWAR;
- (10) TECH DRIVE PVT LLC;
- (11) ASHHAR RAWOOF; AND
- (12) SMART STARTUP SOLUTIONS,  
LLC

1 I, EMILY GOODELL, declare under penalty of perjury under laws of the State of  
2 California that the foregoing is true and correct.

3 1. I am over the age of eighteen and am competent to testify as to the matters set forth  
4 herein. I have personal knowledge of the facts in this declaration, and base this declaration on my  
5 personal knowledge.

6 2. I am an attorney for the law firm Davis Wright Tremaine (“DWT”), which  
7 represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc., in this matter.

8 3. I make this Declaration in support of Amazon’s Request for Entry of Default  
9 Pursuant to Federal Rule of Civil Procedure 55(a) as to Defendants: (1) VTLogodesign, Inc.; (2)  
10 MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6)  
11 One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techure Inc.;  
12 (9) Muhammad Mudassar Anwar; (10) Tech Drive PVT LLC; (11) Ashhar Rawoof; and (12)  
13 Smart Startup Solutions, LLC.

14 4. Amazon filed its Complaint in this action on October 30, 2023. Dkt. No. 1.

15 **VTLogodesign, Inc.**

16 5. According to public records from the Florida Secretary of State, VTLogodesign,  
17 Inc. is a Florida corporation that was dissolved on September 22, 2022 for failure to file an annual  
18 report. **Exhibit A** at 1.

19 6. Amazon unsuccessfully attempted to serve VTLogodesign, Inc.’s registered agent  
20 for service of process on November 24, 2023. **Exhibit B** at 1; Dkt. No. 21.

21 7. Amazon unsuccessfully attempted to serve the only person listed on  
22 VTLogoDesign, Inc.’s Articles of Incorporation and latest annual corporate report, its President  
23 Muhammad Usman Khan (“Khan”), *see* **Exhibit A** at 1, in three ways. First, I attempted personal  
24 service on Khan at the Fairfax, Virginia address listed in VTLogodesign, Inc.’s corporate records  
25 on November 15, 2023. The process server informed that a man who answered the door at that  
26 residence informed him that Khan had not lived at that address for years and was currently living  
27 in California. My law firm’s research librarians could not identify any California address linked  
28 to Khan.

8. Second, I directed that Khan be served at an address in Pakistan in a manner consistent with the Hague Service Convention through the company Crowe Foreign Services, and received confirmation that service documents had been sent to the Pakistan Central Authority on November 28, 2023. A representative from Crowe Foreign Services, which is handling the service process for Khan, indicated that Hague Convention service in Pakistan “is unpredictable and unreliable with time frames considered extreme” and “can take anywhere from 3 to 9 months because it is under the control of the Pakistan Ministry of Justice and no request for expedited service is acknowledged.” A motion for alternative service on Khan is pending at this time. Dkt. No. 16.

9. Third, I sent correspondence via registered email to three email addresses ([mkhan@voipterminator.com](mailto:mkhan@voipterminator.com), [usman@khans.pk](mailto:usman@khans.pk), and [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com)) on October 31, 2023. The first two email addresses I found in a document filed in the United States District Court in the Middle District of Florida, case 6:22-cv-00798-PGB-GJK, that indicates that “United States’ counsel at the Federal Trade Commission conferred with Defendant Muhammad Usman Khan by phone and email” and that Khan, a defendant, was being served by electronic mail on April 26, 2022 to those addresses. The third email address was in Amazon’s business records indicating that an account using the name “vtlogodesign inc” [*sic*] and email address [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com) was registered on July 25, 2022. Addresses and payment methods on the account are listed with the names “VTLOGODESIGN, INC” and “Muhammad Usman Khan.” I received confirmation that the email to [usman@khans.pk](mailto:usman@khans.pk) was delivered, and that the email sent to the [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com) was delivered and opened. I have not received a response to any of those three emails.

10. On December 19, 2023, Amazon served VTLogodesign, Inc. with the Summons; Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case through substitute service on the Florida Secretary of State, which was accepted, as permitted under Florida law. *See Exhibit C*; Dkt. No. 34; Fla. Stat. §§ 48.101; 48.081(4); 48.161.

11. To date, VTLogodesign, Inc. has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action. Amazon has received no communications from VTLogodesign, Inc. indicating an intention to defend itself in this action.

**MK Affiliates, Inc.**

12. According to public records from the Florida Secretary of State, MK Affiliates, Inc. is a Florida corporation which was dissolved on September 22, 2023 for failure to file an annual report. **Exhibit D.** Amazon attempted to serve MK Affiliates Inc. at the address for its registered agent in Orlando, Florida, and received a proof of service that appeared to confirm MK Affiliates had been served. **Exhibit E** at 7; Dkt. No. 23 at 1. However, on December 11, 2023, I received an email from the purported registered agent notifying Amazon that it was not MK Affiliates, Inc.'s registered agent. **Exhibit E** at 12.

13. Amazon unsuccessfully attempted to serve the only other person listed in MK Affiliates, Inc.'s Articles of Incorporation, its Muhammad Usman Khan. *See* **Exhibit E** at 5.

14. On December 19, 2023, Amazon effected service on Defendant MK Affiliates, Inc. with the Summons; Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case via substitute service on the Florida Secretary of State, which was accepted, as permitted under Florida law. *See* **Exhibit F**; Dkt. No. 33.

15. To date, MK Affiliates, Inc. has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action.

**Ali Alam**

16. On November 15, 2023, Amazon effected service on Defendant Ali Alam with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to

Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. **Exhibit G**; Dkt. No. 26 at 1. Amazon served Mr. Alam via personal service. *Id.*

17. To date, Mr. Alam has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared in this lawsuit to defend himself against Amazon's allegations in this action.

#### **Dynamic Digital Solutions LLC**

18. According to public records from the Virginia State Corporation Commission, Dynamic Digital Solutions LLC is a limited liability company incorporated in Virginia. **Exhibit H**. Ali Alam is a manager or member of Dynamic Digital Solutions, LLC as well as its registered agent for service of process. *Id.*

19. On November 15, 2023, Amazon effected service on Defendant Dynamic Digital Solutions LLC with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit G*; Dkt. No. 26 at 2. Amazon served Dynamic Digital Solutions LLC via personal service on its registered agent Ali Alam. *Id.*

20. To date, Dynamic Digital Solutions LLC has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action.

#### **Mehwash Munir**

21. On November 18, 2023, Amazon effected service on Defendant Mehwash Munir with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit I*; Dkt. No. 31. Amazon served Ms. Munir via personal service. *Id.*

22. To date, Mehwash Munir has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend herself against Amazon's allegations in this action.

**One Stop Computer Services LLC**

23. According to public records from the Virginia State Corporation Commission, One Stop Computer Services LLC is a limited liability company incorporated in Virginia which cancelled its registration by filing Articles of Cancellation on November 9, 2023. **Exhibit J.** The Articles of Cancellation identify Mehwash Munir as the individual who has been delegated the power to manage the company's business and affairs. **Exhibit K.** Ms. Munir is also listed as One Stop's registered agent for service of process. **Exhibit J.**

24. On November 15, 2023, Amazon effected service on One Stop Computer Services LLC with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit G*; Dkt. No. 26 at 3. Amazon served One Stop Computer Services LLC via personal service on its registered agent Mehwash Munir. *Id.*

25. To date, One Stop Computer Services LLC has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action.

**Muhammad Zubair Khan**

26. On November 14, 2023, Amazon effected service on Defendant Muhammad Zubair Khan with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit L* at 1; Dkt. No. 25 at 1. Amazon served Muhammad Zubair Khan via personal service at his residence. *Id.*

27. To date, Mr. Khan has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend himself against Amazon's allegations in this action.

**Techture Inc.**

28. According to public records from the California Secretary of State, Techture Inc. is a corporation incorporated in California. **Exhibit M.** Muhammad Zubair Khan is listed on Techture's most recent Statement of Information as its designated agent for service of process. *Id.* at 1.

29. On November 14, 2023, Amazon effected service on Defendant Techture Inc. with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit L* at 2; Dkt. No. 25 at 2. Amazon served Techture Inc. via personal service on its registered agent Mr. Khan. *See id.*

30. To date, Techture Inc. has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action.

**Muhammad Mudassar Anwar**

31. On November 27, 2023, Amazon effected service on Defendant Muhammad Mudassar Anwar with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit N* at 1; Dkt. No. 27. Amazon served Mr. Anwar via personal service. *See id.*

32. To date, however, Mr. Anwar has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend himself against Amazon's allegations in this action.

**Tech Drive PVT LLC**

33. According to public records from the New York State Division of Corporations, Tech Drive PVT LLC is a limited liability company incorporated in New York. **Exhibit O.** According to its Articles of Organization, the New York Secretary of State is designated as the



1 agent upon whom process may be served. Tech Drive PVT provided the name and address to  
2 which the Secretary of State shall mail a copy of any process as Muhammad Mudassar Anwar, at  
3 919 Wilmot Rd., Scarsdale, NY 10583. *Id.* at 2. There are no other members or managers of  
4 Tech Drive PVT listed in its Articles of Organization, and Tech Drive PVT has made no other  
5 filings with the Secretary of State indicating it has other members of managers. *Id.*

6 34. On November 15, 2023, service was attempted upon the New York Secretary of  
7 State. I received notice that service was unsuccessful because the New York Secretary of State  
8 only accepts New Court court-venued papers.

9 35. On November 27, 2023, Amazon effected service on Tech Drive PVT LLC with  
10 the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and  
11 ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to  
12 Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of  
13 Case. *See Exhibit N* at 2; Dkt. No. 27 at 2. Amazon served Tech Drive PVT LLC via personal  
14 service on its organizer and the individual listed to receive process, Muhammad Mudassar Anwar,  
15 at the address listed on the Articles of Organization, 919 Wilmot Rd., Scarsdale, NY 10583. *See*  
16 *id.*

17 36. To date, Tech Drive PVT LLC has not served any responsive pleading, requested  
18 additional time to serve a responsive pleading, or otherwise appeared to defend itself against  
19 Amazon's allegations in this action.

20 **Ashhar Rawoof**

21 37. On November 27, 2023, Amazon effected service on Defendant Ashhar Rawoof  
22 with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference  
23 and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination  
24 to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment  
25 of Case. *See Exhibit N* at 3; Dkt. No. 27. Amazon served Mr. Rawoof via personal service. *See*  
26 *id.*



38. To date, Mr. Rawoof has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend himself against Amazon's allegations in this action.

**Smart Startup Solutions, LLC**

39. According to public records from the Illinois Department of Business Services, Smart Startup Solutions, LLC is a limited liability company organized in Illinois. **Exhibit P.** The Registered agent is United States Corporation Agents, Inc., and the only member or manager listed in its Articles of Organization is Ashar Rawoof. *Id.*

40. On November 20, 2023, Amazon effected service on Smart Startup Solutions, LLC with the Complaint; Demand for Jury Trial; Order Setting Initial Case Management Conference and ADR Deadlines; Standing Order for Magistrate Judge Donna M. Ryu; Consent or Declination to Magistrate Judge Jurisdiction (blank); and Notice of Electronic Filing - Notice of Assignment of Case. *See Exhibit Q* at 1; Dkt. No. 29 at 1. Amazon served Smart Startup Solutions, LLC via personal service on its registered agent, United State Corporation Agents, Inc. *See id.*

41. To date, Smart Startup Solutions, LLC has not served any responsive pleading, requested additional time to serve a responsive pleading, or otherwise appeared to defend itself against Amazon's allegations in this action.

42. Attached hereto as **Exhibit A** is a true and correct copy of the public business records of VTLogodesign, Inc, as captured from the website of the Florida Secretary of State on January 22, 2024.

43. Attached here to as **Exhibit B** is a true and correct copy of the unexecuted Proofs of Service for VTLogodesign, Inc., filed in this action on December 15, 2023 as Docket No. 21.

44. Attached hereto as **Exhibit C** is a true and correct copy of the Florida Acceptance of Service on behalf of VTLogodesign, Inc., filed in this action on December 22, 2023 as Docket No. 34.

45. Attached hereto as **Exhibit D** is a true and correct copy of the public business records of MK Affiliates, Inc., as captured from the website of the Florida Secretary of State on January 22, 2024.

1           46. Attached hereto as **Exhibit E** is a true and correct copy of the Affidavit of Emily  
2 Goodell Re Service of MK Affiliates, filed in this action as Docket No. 23.

3           47. Attached hereto as **Exhibit F** is a true and correct copy of the Florida Acceptance  
4 of Service on behalf of MK Affiliates, Inc., filed on December 22, 2023 in this action as Docket  
5 No. 33.

6           48. Attached hereto as **Exhibit G** is a true and correct copy of the Proofs of Service of  
7 Summons for Ali Alam, Dynamic Digital Solutions LLC, and One Stop Computer Services LLC,  
8 filed on December 15, 2023 in this action as Docket No. 26.

9           49. Attached hereto as **Exhibit H** is a true and correct copy of the public business  
10 records for Dynamic Digital Solutions, LLC, as captured from the website of the Clerk of the  
11 Virginia State Corporation Commission on January 22, 2024.

12           50. Attached hereto as **Exhibit I** is a true and correct copy of the Proof of Service of  
13 Summons for Mehwash Munir, filed on December 15, 2023 in this action as Docket No. 31.

14           51. Attached hereto as **Exhibit J** is a true and correct copy of the Articles of  
15 Cancellation records for One Stop Computer Services LLC records from the Virginia State  
16 Corporation Commission, as captured from the website of the Clerk of the Virginia State  
17 Corporation Commission on January 22, 2024.

18           52. Attached hereto as **Exhibit K** is a true and correct copy of the public business  
19 records for One Stop Computer Services LLC records from the Virginia State Corporation  
20 Commission, as captured from the website of the Clerk of the Virginia State Corporation  
21 Commission on January 22, 2024. Attached hereto as **Exhibit L** is a true and correct copy of the  
22 Proofs of Service of Summons for Muhammad Zubair Khan and Techtire Inc., filed on December  
23 15, 2023 in this action as Docket No. 25.

24           53. Attached hereto as **Exhibit M** is a true and correct copy of the public business  
25 records for Techtire Inc., captured from the California Department of State's website on January  
26 22, 2024.

